



CREATING
LAW
ENFORCEMENT
ACCOUNTABILITY &
RESPONSIBILITY

Main Street Legal Services, Inc.
CUNY School of Law
2 Court Square
Long Island City, NY 11101-4356
www.cunyclear.org

Via ECF

March 23, 2025

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Courthouse
Federal Square
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al., Civ. Act. No. 25-1963 (MEF)***
**Proposed Deadline for Petitioner's Reply to Respondents' Opposition to
Petitioner's Motion for Release**

Dear Judge Farbiarz:

On behalf of Petitioner, and pursuant to this Court's Order, ECF 85, I write to inform the Court that Petitioner will file his reply in further support of his motion for release by Tuesday, March 25, 2025, at 5:00 pm ET, or at the earliest possible opportunity, in light of the urgency of Petitioner's underlying motion.

Respectfully submitted,

/s/ Naz Ahmad

Naz Ahmad
CLEAR PROJECT
MAIN STREET LEGAL SERVICES, INC.
CUNY School of Law
2 Court Square
Long Island City, NY 11101
(718) 340-4558
naz.ahmad@law.cuny.edu

Counsel for Petitioner

cc: All parties